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March 27, 2023

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Kocar v. The Port Authority of NY and NJ*, 19-cv-11508 (JLR)  
Letter Motion for Second Extension in Filing Deadlines

Dear Judge Rochon:

We write jointly to request an extension in the motion and pretrial preparation schedule in this action. This is the parties' second request for an extension in these deadlines.

The Court ordered that by March 31, 2023, the parties were to submit any motions in limine. Oppositions to motions in limine were to be submitted by April 17, 2023. Further, by March 31, 2023, the parties were to submit all required pretrial filings, including their proposed joint pretrial order, requests to charge, verdict form, voir dire questions, documentary exhibits and demonstratives, and all other required submissions in accordance with Rule 5 of the Court's Individual Rules of Practice. *See* Dkt. 56.

The parties respectfully request an extension in the foregoing deadlines as follows: The motions in limine if any shall be filed on or before May 15, 2023 along with all pretrial filings as required by the Court's Individual Practice Rules. Oppositions to motions in limine shall be filed on or before June 5, 2023. This extension of time will provide the parties with sufficient time to exchange submissions and confer on the necessary witnesses and exhibits in advance of the October 30, 2023 trial date.

The reasons for this extension and its length are several. First, the parties have yet to complete their respective filings and plan to exchange documents prior to the court deadline to attempt to minimize redundancies and facilitate agreements and require additional time to effectuate this plan. Second, counsel for Plaintiff's client is working nights, which makes scheduling mutually convenient time to review exhibits difficult. Third, counsel for Defendant is

*Jennifer Rochon*  
**JENNIFER L. ROCHON**  
**United States District Judge**